

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MICHAEL C. HAGGERTY	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Civil Action No. 02-4780
	:	
JOHN ASHCROFT, UNITED STATES	:	
DEPARTMENT OF JUSTICE	:	
	:	
Defendant.	:	

O R D E R

And now, this day of , 2002,
upon consideration of defendants' uncontested motion for an
extension of time in which to respond to the complaint, it is
hereby

ORDERED

that the motion for an extension of 14 days to respond to the
complaint is granted for the reasons set forth in defendant's
uncontested motion and incorporated herein by reference.
Defendants' response to plaintiff's complaint shall be filed on or
before October 4, 2002.

BY THE COURT:

J.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MICHAEL C. HAGGERTY	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Civil Action No. 02-4780
	:	
JOHN ASHCROFT, UNITED STATES	:	
DEPARTMENT OF JUSTICE	:	
	:	
Defendant.	:	

DEFENDANTS' UNCONTESTED MOTION FOR EXTENSION
OF TIME TO ANSWER OR OTHERWISE
RESPOND TO PLAINTIFF'S COMPLAINT

Defendants, by and through their counsel for purposes of this motion only, respectfully requests a 14-day extension of time until October 4, 2002, in which to answer or otherwise respond to plaintiff's complaint. The following grounds support this motion:

1. This is an action brought pursuant to Title VII of the Civil Rights Act, as amended, in which plaintiff claims that he was discriminated against on the basis of his race by the defendant.

2. Counsel for the defendant made a timely request to the Immigration and Naturalization Service ("INS") to obtain the administrative record of this case as well as any other documentation relevant to the allegations raised in plaintiff's complaint. However, said request was inadvertently made to the local office, instead of the regional office.

3. Counsel is advised that the INS, whose regional general counsel is located in Vermont, will need more time to gather the information necessary to prepare a response to the allegations of plaintiff's complaint.

4. Wherefore, defendant respectfully requests that this Honorable Court grant defendant an additional 14 days to answer or otherwise plead to plaintiff's complaint.

5. Plaintiff does not object to this request.

WHEREFORE, defendant respectfully requests that this Court grant his request for a 14 day extension, until October 4, 2002, in which to answer or otherwise respond to the Complaint.

Respectfully submitted,

PATRICK L. MEEHAN
United States Attorney

JAMES G. SHEEHAN
Assistant United States Attorney

NADINE M. OVERTON
Assistant United States Attorney

CERTIFICATE OF UNCONTESTED MOTION

I, NADINE M. OVERTON, Assistant United States Attorney, hereby certify that I spoke with the pro se plaintiff, Michael C. Haggerty, and plaintiff does not oppose the request for extension of time.

NADINE M. OVERTON
Assistant United States Attorney

CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing Defendant's Uncontested Motion for Extension Of Time to Answer Plaintiff's Complaint was served by first-class, United States Mail, postage prepaid, this 17th day of September, upon the following:

Michael G. Haggerty, pro se
1 Country Brook Drive
Doylestown, PA 18901-2282

NADINE M. OVERTON
Assistant United States Attorney